
TECHNICAL MEMORANDUM

To: Alex Liverman and Matt McClincy, Oregon Department of Environmental Quality
From: Peter Shanahan, HydroAnalysis
Subject: **Review of the Draft Source Control Decision for Owens Corning - Linnton Roofing and Asphalt Facility, June 27, 2016**
Date: August 12, 2016

This review of the source control decision (DEQ, 2016b) for the Owens Corning Linnton Roofing and Asphalt Facility has been prepared on behalf of the Five Tribes¹. DEQ (2016a) currently lists this as a low-priority site for source control. DEQ determined, and I concur, that neither contaminated groundwater nor erosion are potential sources at this site.

The most significant potential pathway for this site is stormwater. Best management practices for stormwater and a spill prevention, control, and countermeasures plan are in place and stormwater appears to be well-controlled at the site. In fact, much of the site stormwater is beneficially reused on-site rather than being discharged. Based on these facts and a review of measured contaminant concentrations in site soils, stormwater, and stormwater solids, DEQ concludes that the site is adequately characterized and controlled. I concur with that conclusion.

There is one minor, but meaning-changing typo at the end of the first paragraph under Section 4.3.1: "so" should be "no" in "...so collection or analysis was required."

Cited Documents

DEQ, 2016a. Portland Harbor Cleanup Sites. State of Oregon, Department of Environmental Quality. March 24, 2016. <http://www.deq.state.or.us/lq/cu/nwr/PortlandHarbor/docs/PortlandHarborMap.pdf>

DEQ, 2016b. Memorandum from Alex Liverman, Portland Harbor Stormwater Coordinator, to Eva DeMaria, U.S. EPA. Subject: Source Control Decision, Owens Corning - Linnton Roofing and Asphalt Facility, ECSI # 1036. State of Oregon, Department of Environmental Quality. June 27, 2016.

¹ The five tribes are the Confederated Tribes of the Grand Ronde Community of Oregon, the Nez Perce Tribe, the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of the Warm Springs Reservation of Oregon.